



The National Association of
Community Action Agencies (NACAA)

"Helping People to Help Themselves"

Executive Director

John Buckstead

Executive Board

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April 29, 1998

Secretary
Federal Communications Commission
1919 M Street, NW, Room 212
Washington, D.C. 20554

RE: Reply-Comments to Petition of Alliance for Public Technology
Docket No.: RM9244

Dear Sir/Madam:

The National Association of Community Action Agencies (NACAA) submits the attached reply-comments supporting the petition of the Alliance for Public Technology (APT). We request that the Federal Communications Commission adopt rules to encourage telecommunication providers to work together with low-income communities to develop technology applications that address their needs.


NACAA represents over 800 Community Action Agencies across the country. These agencies provide low-income communities with services that address their critical needs. NACAA takes the position that residents of these communities must have access to advancing technology, if we are to make any progress in moving people out of poverty and into sustainable employment. It is for this reason that we encourage the Commission to adopt rules that encourage providers to include these communities in the development of the technology.

The Telecommunications Act of 1996 §706, obligates the Federal Communication Commission to establish rules which will encourage telecommunications providers to deploy telecommunication technology to all Americans in a manner that is reasonable and timely. We do not believe that if providers are encouraged to establish an open dialogue with this hard to reach community that it would place an unreasonable burden on the industry.

Providers should be encouraged to work with low-income communities because everyone will benefit. The community will be educated on the technology and the demand for the technology will be increased. It is for this reason NACAA firmly supports the open dialogue suggested by APT. If there are any questions please contact, Ms. Kim Y. Jones or myself on 202-265-7546.

Sincerely,


John Buckstead
Executive Director

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MAY 4 1993

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Petition of the Alliance for Public Technology)
Requesting Issuance of Notice of Inquiry and) RM-9844
Notice of Proposed Rulemaking to Implement)
Section 706 of the 1996 Telecommunications Act)

**Reply-Comments of the National Association of Community Action Agencies
Supporting Immediate Implementation of Section 706 of the Telecommunications
Act of 1996**

The National Association of Community Action Agencies (NACAA), representing over 800 Community Action Agencies nationwide, support the petition of the Alliance for Public Technology (APT) requesting an inquiry and a rulemaking proceeding to implement Section 706 of the 1996 Telecommunications Act to ensure that new telecommunications technologies are being deployed to every American, including NACAA's low-income constituents.

Community Action Agencies provide a variety of support services to the nations' low-income communities, as such it has become clear that many of our constituents are being are being left out of the equation in this age of emerging technology. NACAA is filing these comments to support APT's petition requesting that the adoption of rules that encourage telecommunications providers to work with communities. In the spirit of §706, providers will be able to develop technology applications that address the needs of low-income residents and in turn establish a demand for their systems. NACAA believes

that, through corporate-community partnerships, the demand for telecommunication services in the low-income communities served by Community Action Agencies will be enhanced. Through education and outreach, universal access to telecommunication services could be available to every household in every neighborhood.

An informed consumer population who is aware of the opportunities afforded through new telecommunications technologies does not necessarily arise nor benefit from ordinary market mechanisms. The Commission must assure that consumers are educated about new telecommunications technologies in order to "remove barriers to infrastructure investment and promote competition," a stated objective of Section 706. It is the opinion of NACAA that a lack of information or misinformation also constitutes a barrier to infrastructure investment.

Through partnerships with community-based organizations such as Community Action Agencies, telecommunications providers can involve all members of the consumer population, including low-income people, in establishing and addressing local consumer needs. NACAA does not believe that this constitutes "social engineering," as stated by the Sprint Corporation in its opposition comments¹ but, rather, that such educational resources are essential in assuring access to advanced telecommunications capability for all Americans.

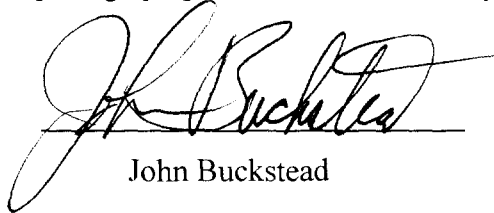
¹ Comments of the Sprint Corporation, In the Matter of Petition of Alliance for Public Technology for Commission Issuance of a Notice of Inquiry and a Notice of Proposed Rulemaking to Implement Section 706 of the Telecommunications Act (RM No. 9244), CCB/CPD Docket No. 98-15 (April 13, 1998).

Finally, NACAA implores the Commission to recognize the fault in the Sprint Corporation's suggestion that deploying advanced services only to the high-end market throughout the transition to a competitive market "should be expected"² and, therefore, accepted. The law of supply and demand does not take into account the desire of this nation to afford equal access to information and technology to all Americans on the high-end as well as the low-end market.

² Id.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **REPLY-COMMENTS OF THE NATIONAL ASSOCIATION OF COMMUNITY ACTIONS** was Hand Delivered or sent by United States first-class mail, postage prepaid, on this the 29th day of April, 1998 to the below listed parties:



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